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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ESTELA RAMIREZ,

Plaintiff,

v.

EXPERIAN INFORMATION SERVICES,
INC. EQUIFAX INFORMATION SERVICES,
LLC, TRANS UNION, LLC, and PLUSFOUR,
INC.

Defendants.

Case No.: 2:20-cv-00566-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
PLUSFOUR INC. TO FILE ANSWER TO
PLAINTIFF'S COMPLAINT**

(FIRST REQUEST)

Plaintiff, ESTELA RAMIREZ ("Plaintiff") and Defendant PLUSFOUR, INC. ("Defendant") (collectively, the "Parties"), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. On March 23, 2020, Plaintiff filed his Complaint. Defendant, PLUSFOUR, INC, in the United States District Court, District of Nevada, titled *Estela Ramirez v. PlusFour, Inc.*, Case No. 2:20-cv-00566.

2. PlusFour, Inc was served the Plaintiff's Complaint on March 31, 2019 through a registered agent and acknowledged receipt of service.

3. Defendant PlusFour's deadline to answer was April 21, 2020.

4. Based on Governor Sisolak's declaration of a public health state of emergency in Nevada as a result of COVID-19, and the accompanying directive for non-essential businesses to shut down, PlusFour, Inc. has suspended operations.

5. In light of the COVID-19 pandemic and office closings, PlusFour, Inc. and its counsel require additional time to investigate and respond to the allegations and claims made by Plaintiff.

1 Accordingly, the parties agree to grant PlusFour, Inc. an initial extension of the deadline to respond
2 to Plaintiff's Complaint to May 27, 2020.

3 6. This Stipulation is made in good faith, not for the purposes of delay, and granting it will
4 not prejudice any party. This extension of time will allow PlusFour, Inc. time to investigate the
5 allegations and claims raised by Plaintiff's Complaint, confer with counsel, and prepare its
6 response. This is Defendant PlusFour's first request for an extension of time.

7 7. On April 24, 2020, PlusFour, Inc.'s counsel conferred with Plaintiff's counsel regarding
8 the basis for this request and its need for an extension. Plaintiff's counsel had not objections and
9 approved for a 30 day extension to the request.

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WHEREAS, the parties hereby stipulate and agree, pursuant to LR IA 6-2, , that Defendant PlusFour's time to answer, move or otherwise respond to Plaintiff's Complaint in this action is extended through and including **May 27, 2020**.

Dated this 30th day of April 2020.	Dated this 30th day of April 2020
SHUMWAY VAN	KIND LAW
By: <u>/s/ Garrett R. Chase</u> Garrett R. Chase, Esq. Nevada Bar No. 14498 8985 S. Eastern Avenue Suite 100 Las Vegas, Nevada 89123 Phone: (702) 478-7770 Email: garret@shumwayvan.com <i>Attorneys for Co-Defendant PlusFour, Inc</i>	By: <u>/s/ Michael Kind</u> Michael Kind, Esq. Nevada Bar No. 13903 8860 S. Maryland Parkway Suite 106 Las Vegas, Nevada 89123 Phone: (702) 337-2322 Email: mk@kindlaw.com
	HAINES & KRIEGER, LLC George Haines, Esq. Nevada Bar No. 9411 8985 S. Eastern Avenue Suite 350 Las Vegas, Nevada 89123 Phone: (702) 880-5554 Email: ghaines@hainesandkrieger.com <i>Attorneys for Plaintiff Estela Ramirez</i>

IT IS SO ORDERED

DATED: May 01, 2020

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

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Submitted by:

SHUMWAY VAN

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